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NATURAL RESOURCES
Michael L. Parson, Governor Carol S. Comer, Director

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August 22, 2018

Mr. Clint Sperry
EPA Remedial Project Manager
U.S. Environmental Protection Agency, Region VII
Superfund Division, MOKS Branch
11201 Renner Blvd.
Lenexa, Kansas 66219

SUPERFUND DIVISION

Dear Mr. Clint Sperry;

The Department of Natural Resources (Department) has reviewed Ameren's "Remedial Investigation Report, Huster Road Substation, 3760 Huster Road, St. Charles, Missouri." The following comments are provided for your consideration.

1. Please enlarge the size of the figures and tables within the RI Report to provide better detail for reference.
2. Please provide an "Acronym and Abbreviation List" at the beginning of the report.
3. Section 1.1, page 5: The section states the provided RI Report is a consolidation of all the previous investigations and pilot studies conducted on-site and off-site. As such, it should still follow the "Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA" and be comprehensive enough to provide detailed information, data and results based on the previous site investigations and pilot studies to follow all the progress that Ameren has achieved up to the completion of the report.
4. Section 1.2.3.1, page 6: The report is inconsistent in its use of COCs and COPCs. When writing about site-wide contamination, please use "contaminants of (potential) concern(s)" for COC(s) and/or COPC(s).
5. Beginning in Section 1.2.3.1 on page 7 a number of typos were noted throughout the RI Report. Please review and revise.
6. Section 1.2.3.3, page 8: Please indicate on Figure 4 where the "points of interest as discussed in the previous paragraph are located."
7. Beginning in Section 1.2.3.4 on page 8 some sections contain references while others do not. Please provide references in sections that will assist the reviewer.



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8. Section 1.2.3.6, page 12: Please label the table and add to reference list in "Table of Contents."
9. Section 2.1.1, page 13: Please label figure at top of page and add to reference list in "Table of Contents."
10. Section 2.1.3, page 13: Please provide a figure with the soil boring locations. Also, please provide a reference for the section.
11. Section 2.1.4, page 13: Please indicate whether the groundwater locations in the first sentence were wells and/or piezometers, why the different depths were explored and why the groundwater profiling was conducted. Please provide a summary of results and conclusions.
12. Section 4.0: Please explain why only one on-site and off-site groundwater and soil sampling event was chosen for pre-treatment and post-treatment to determine the nature, extent and trends of the VOC contamination in groundwater and soil. Please revise to include as much usable information and data.
13. Section 4.1, page 15: Please label the figure and table and add to the reference list in "Table of Contents."
14. Section 4.1.1, page 18: The four COCs provided on the table dated on 08/27/2014 for MW-40 are all listed below specific values, so one or more COCs must have had large detections. Please provide the COC(s) with the large detection and explain what this indicates for the well. Please label the table and add to the reference list in "Table of Contents."
15. Section 6.0, Baseline Risk Assessment: The COPCs listed for groundwater and soils does not contain cis-1,2-DCE or vinyl chloride. Please explain why cis-1,2-DCE or vinyl chloride are not included in the analysis for the Baseline Risk Assessment, since both COCs do have detections above the MCL.

If you have any questions or concerns, please do not hesitate to contact me at the Missouri Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65101-0176, by telephone at (573) 751-1738, or by email at candice.mcghee@dnr.mo.gov.

Sincerely,

HAZARDOUS WASTE PROGRAM



Candice McGhee
CM: rc